

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MOTOROLA, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
LEMKO CORPORATION, XIAOHONG	)	
SHENG, SHAOWEI PAN, HANJUAN JIN,	)	
XIAOHUA WU, XUEFENG BAI,	)	
NICHOLAS LABUN, BOHDAN PYSKIR,	)	
HECHUN CAI, JINZHONG ZHANG,	)	
ANGEL FAVILA, ANKUR SAXENA,	)	Case No. 08 CV 5427
RAYMOND HOWELL, FAYE VORICK,	)	
and NICHOLAS DESAI,	)	
	)	
	)	
	)	
Defendants.	)	Judge Matthew F. Kennelly
	)	
* * * * *	)	Magistrate Judge Geraldine Soat Brown
LEMKO CORPORATION, SHAOWEI PAN,	)	
XIAOHUA WU and XIAOHONG SHENG,	)	
	)	
Counter-Plaintiffs,	)	
	)	
v.	)	
MOTOROLA, INC.,	)	
	)	
Counter-Defendant.	)	

**NOTICE OF MOTOROLA, INC.'S MOTION TO SEEK LEAVE TO TAKE  
ADDITIONAL DEPOSITIONS OF LEMKO CORPORATION PERSONNEL, LEMKO  
INDIVIDUAL DEFENDANTS, AND THIRD PARTIES**

PLEASE TAKE NOTICE that on Wednesday, November 30, 2011 at 9:30 a.m., or as soon thereafter as counsel may be heard, counsel for Plaintiff Motorola, Inc. (n/k/a Motorola Solutions, Inc.) will appear before the Honorable Matthew F. Kennelly in the courtroom usually occupied by him, Room 2103 of the Dirksen Federal Building, 219 South Dearborn Street,

Chicago, Illinois, and present **MOTOROLA, INC.'S MOTION TO SEEK LEAVE TO TAKE ADDITIONAL DEPOSITIONS OF LEMKO CORPORATION PERSONNEL, LEMKO INDIVIDUAL DEFENDANTS, AND THIRD PARTIES**, a copy of which has been served via the Court's electronic filing system upon all counsel of record.

Date: November 23, 2011

Respectfully submitted,

By: /s/ Jason T. Kunze

R. Mark Halligan  
Deanna R. Swits  
Jason T. Kunze  
NIXON PEABODY LLP  
300 South Riverside Plaza, 16<sup>th</sup> Floor  
Chicago, Illinois 60606  
T: (312) 425-3900  
F: (312) 425-3909

Dan K. Webb  
Lawrence R. Desideri  
Raymond C. Perkins  
Maureen L. Rurka  
J. Ethan McComb  
Joanna R. Travalini  
WINSTON & STRAWN LLP  
35 West Wacker Drive  
Chicago, Illinois 60601  
T: (312) 558-5600  
F: (312) 558-5700

*Attorneys for Plaintiff Motorola, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing NOTICE OF MOTION was filed electronically in compliance with the General Order on Electronic Case Filing, Section III(B)(1). As such, these documents were served on all counsel who are deemed to have consented to electronic service. Fed. R. Civ. P. 5(b)(2)(D) and Local Rule 5.9.

Date: November 23, 2011

/s/ Jason T. Kunze

*Attorney for Plaintiff Motorola, Inc.*